



Cotton Growers Warehouse Association

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October 3, 2001

Via E-Mail: USWA1@wdc.usda.gov

Mr. Roger Hinkle
Chief, Licensing Authority Branch
Warehouse & Inventory Division
Farm Service Agency
USDA
STOP 0553
1400 Independence Avenue, SW
Washington, DC 20250-0553

*Regarding The Proposed Rule: Implementation of the US Warehouse Act, 66 F.R. 46310,
September 4, 2001*

Dear Mr. Hinkle:

On behalf of the Cotton Growers Warehouse Association, representing nine warehousing organizations doing business in 11 or more states, whose combined membership represents over 25,000 producers, who annually produce over 5-million bales of cotton, I am making comment on the above-referenced Federal Register notice involving the US Warehouse Act:

Arbitration

Our Association has repeatedly instructed the Agency that we are opposed to any form of arbitration other than mutually agreed upon procedures in addressing disputes involving our members in cotton flow or other disputes. We object to the implication in this proposed rule that mandatory arbitration can be applied in certain instances in settling disputes.

Sincerely,

Vern F. Highley
Executive Director

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